

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.:

Date Purchased:

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AYALA MARCKTELL,

Plaintiff designates
NEW YORK County as the
Place of Trial

Plaintiff,

SUMMONS

-against-

The basis of venue is
Plaintiff's residence.

NORDSTROM, INC.,

Plaintiff resides at
401 East 81st Street #18B
New York, NY 10028

Defendant.

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To the above named Defendant(s):

YOU ARE HEREBY SUMMONED to Answer the Complaint in this action and to serve a copy of your Answer, of, if the Complaint is not served with this Summons, to serve a notice of appearance, on Plaintiff(s) Attorneys within twenty (20) days after the service of this Summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or Answer, Judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: New York, NY
June 18, 2020

Yours, etc.,
GREENBERG LAW P.C.



By: Raquel J. Greenberg, Esq.
Attorney for Plaintiff
370 Lexington Avenue, Suite 1100
New York, NY 10017
(212) 972-5656

DEFENDANTS' ADDRESSES:

NORDSTROM, INC. c/o Secretary of State

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X Index Number:
AYALA MARCKTELL,

VERIFIED COMPLAINT

Plaintiff,

-against-

**PLAINTIFF DEMANDS A
TRIAL BY JURY**

NORDSTROM, INC.,

Defendant.

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Plaintiff, complaining of the defendant, by her attorneys, GREENBERG LAW P.C., hereby respectfully alleges upon information and belief as follows:

1. At all times hereinafter mentioned, defendant NORDSTROM, INC. was and still is a foreign business company duly organized and existing under and by virtue of the laws of the State of Washington.

2. At all times hereinafter mentioned, defendant NORDSTROM, INC. transacted business in the State of New York.

3. At all times hereinafter mentioned, defendant NORDSTROM, INC. was the owner of premises located at 225 West 57th Street, County, City and State of New York (hereinafter referred to as “the subject premises”).

4. At all times hereinafter mentioned, defendant NORDSTROM, INC. was a tenant of premises located at 225 West 57th Street, County, City and State of New York (hereinafter referred to as “the subject premises”).

5. At all times hereinafter mentioned, defendant NORDSTROM, INC., its agents, servants and/or employees operated the subject premises.

6. At all times hereinafter mentioned, defendant NORDSTROM, INC., its agents,

servants and/or employees managed the subject premises.

7. At all times hereinafter mentioned, defendant NORDSTROM, INC., its agents, servants and/or employees maintained the subject premises.

8. At all times hereinafter mentioned, defendant NORDSTROM, INC., its agents, servants and/or employees controlled the subject premises.

9. At all times hereinafter mentioned, defendant NORDSTROM, INC., its agents, servants and/or employees had a duty to maintain the subject premises in a reasonably safe condition.

10. That on or about November 8, 2019 at approximately 1:45 PM, Plaintiff AYALA MARCKTELL was lawfully in and upon the subject premises, and more particularly on the lower level.

11. That on or about November 8, 2019 at approximately 1:45 PM, while Plaintiff AYALA MARCKTELL was lawfully walking the lower level of the subject premises, specifically within the shoe department, she was caused to trip and fall and be seriously injured due to a dangerous and/or defective and/or negligently placed stool existing on the floor thereat.

12. That as a result of the foregoing, Plaintiff AYALA MARCKTELL sustained severe and permanent personal injuries.

13. The injuries suffered by Plaintiff AYALA MARCKTELL were caused solely by the negligence, recklessness and carelessness of defendant in the ownership, operation, design, construction, management, maintenance and control of the subject premises.

14. The cause of action asserted herein is not subject to the provisions of Article 16 of the CPLR and/or comes within the stated exceptions as set forth in CPLR §1602(1), 1602(2), 1602(3), 1602(4), 1602(5), 1602(6), 1602(7), 1602(8), 1602(9), 1602(10), 1602(11), 1602(12) and 1602(13).

15. That as a result of the foregoing, Plaintiff AYALA MARCKTELL has sustained damages in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction herein.

WHEREFORE, Plaintiff demands judgment against defendants, jointly and severally, in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction herein, together with the costs and disbursements of this action.

Dated: New York, NY
June 18, 2020

GREENBERG LAW P.C.



By: Raquel J. Greenberg, Esq.
Attorney for Plaintiff
370 Lexington Avenue, Suite 1100
New York, NY 10017
(212) 972-5656

CLIENT VERIFICATION

STATE OF NEW YORK)

: ss.:

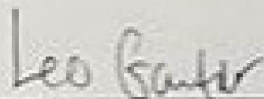
COUNTY OF NEW YORK)

AYALA MARCKTELL, being duly sworn, deposes and says:

That I am the plaintiff herein in the within action, that I have read the foregoing SUMMONS AND VERIFIED COMPLAINT and know the contents thereof; that the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters affirmant believes to be true.


AYALA MARCKTELL

Sworn to before me this
10th day of June, 2020.



Notary Public

LEO M. GAUTHIER
NOTARY PUBLIC-STATE OF NEW YORK
Registration No. 01645398467
Qualified in New York County
Commission Exp September 30, 2023

CERTIFICATION

This is to certify that, to the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of this paper or the contentions therein are not frivolous as defined in subsection (c) of section 130-1.1 of the Rules of the Chief Administrator (22NYCRR).

GREENBERG LAW P.C.



By: Raquel J. Greenberg, Esq.
Attorney for Plaintiff
370 Lexington Avenue, Suite 1100
New York, NY 10017
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